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August 17, 2021

**VIA ELECTRONIC FILING**

The Honorable Leonard P. Stark  
U.S. District Court for the District of Delaware  
844 North King Street  
Wilmington, Delaware 19801

Re: *Crystallex International Corporation v. Bolivarian Republic of Venezuela*  
*et al.*, C.A. No. 17-mc-151-LPS

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Dear Chief Judge Stark:

CITGO Petroleum Corporation (“CITGO”) and PDV Holding, Inc. (“PDVH”) object to entry of the proposed order approving the fees the Special Master and his Advisors have submitted for the month of July 2021. D.I. 304; D.I. 306. As explained in the Special Master’s fee report, he and his Advisors spent much of July preparing the Proposed Sale Procedures Order and its accompanying exhibits (together, the “Proposed Order”), D.I. 302, ultimately filed under seal with this Court on August 9, 2021. Objections to the Proposed Order are due on August 25, 2021. D.I. 299. CITGO and PDVHs’ objections to the fees requested by the Special Master and his Advisors for their work during the month of July are directly informed by the substantive objections to the Proposed Order that CITGO and PDVH, along with the other Venezuela Parties, will explain in detail in the briefing due on August 25.

Accordingly, for purposes of judicial economy and all parties’ efficient briefing, CITGO and PDVH propose that three-page letter briefs addressing specific objections to the Special Master’s July fees be filed concurrently with objections to the Proposed Order on August 25, 2021. CITGO and PDVH propose that three-page responsive briefs be due on August 30, 2021, and any two-page reply briefs be due on September 1, 2021.

Respectfully submitted,

*/s/ Kenneth J. Nachbar*

Kenneth J. Nachbar (#2067)

cc: All Counsel of Record (Via E-Filing)